

THE USE OF “PEER CHECKERS” DURING INITIAL LICENSING EXAMINATIONS

Issue

The NRC staff understands that some utilities use a “peer check” process during training and operations to provide assurance that procedures are performed correctly. In practice, one crew member confirms or corrects the intended actions of another crew member who then completes the required procedural actions; thus, the “peer checker” helps ensure that the completed actions are accurate. Since the “peer check” process may be an integral part of some utilities’ training and operations protocols, they have expressed a desire to preserve an element of that process during the initial operator licensing examination in order to maintain the applicants’ sense of operational continuity and job-relatedness.

Discussion

The NRC agrees that, in a training and operating plant environment, the “peer check” process is arguably a good safeguard that promotes accurate job performance. However, during the NRC operating test, in which **individual applicants** are evaluated on their knowledge and understanding of facility operating procedures, actions, and critical steps -- so as to make a licensing decision at the individual level -- it is important that every applicant’s knowledge and understanding be sufficiently separable (i.e., independent and without external assistance). Any confirmation or correction of an applicant’s actions during the licensing examination could interfere with and confound the individual evaluations and threaten discriminant validity.

Therefore, in an effort to maintain the applicants’ sense of operational continuity and job-relatedness without undermining the NRC license examiners’ ability to evaluate their applicants’ individual knowledge and understanding of the facility’s operating procedures, the NRC staff has concluded that peer checks should be allowed during initial operator licensing operating tests subject to the additional guidance outlined below. This additional guidance clarifies the existing guidance in Revision 8, Supplement 1, of NUREG-1021, “Operator Licensing Examination Standards for Power Reactors,” and will be incorporated in the next formal revision of that document.

Additional Guidance

1. During the walk-through portion of the operating test (i.e., Categories A and B), NRC license examiners will fulfill the “peer checker” role if it is required by the facility licensee’s conduct of operations and training procedures and practices. However, the NRC examiners’ role will be limited to **acknowledging** the applicant’s intended or completed actions, regardless of their accuracy. If the applicant’s intended actions are erroneous, the examiner will simply acknowledge the applicant’s request for a peer check, agree with the intended actions, and grade the error in accordance with ES-303 of NUREG-1021. Pursuant to Section D.1.j of ES-302 and Instruction C.3 of Appendix E of NUREG-1021, facility staff may not be used as “peer checkers.”

Add the following instructions to the applicant briefing conducted pursuant to Part D of Appendix E of NUREG-1021, Revision 8, to ensure that the applicants understand how peer checks will be performed during the walk-through portion of the operating test:

If your facility licensee's procedures and practices require the use of peer checks, you may request the NRC examiner to perform that function. However, because the NRC examiner must be able to evaluate your individual performance without assistance from others, he or she will simply acknowledge your proposed actions, regardless of their accuracy or correctness.

2. During the dynamic simulator portion of the operating test (i.e., Category C), the operating team or crew (including license applicants and surrogates, if applicable) should perform peer checks in accordance with the facility licensee's conduct of operations and training procedures and practices. Additional facility staff may not be stationed or called upon for peer checks, nor will the NRC examiners perform this function. Pursuant to Instruction E.4 of Appendix E of NUREG-1021, if an applicant serves as a "peer checker" during a simulator scenario and misses another applicant's error, then both applicants will be graded accordingly. However, if an applicant intends to commit an error but is prevented from doing so by the peer checker, the applicant will, nevertheless, be held accountable for the consequences of the intended error without regard to mitigation by the crew.

Add the following clarification to Instruction E.4 of Appendix E of NUREG-1021, Revision 8, to ensure that the applicants understand how peer checks will be conducted during the dynamic simulator portion of the operating test:

Members of the operating team or crew (whether applicants and surrogates) should perform peer checks in accordance with the facility licensee's procedures and practices; non crew members and NRC examiners will not perform this function. However, if an applicant intends to make an error that is corrected by a peer checker, the applicant will be held accountable for the consequences of the intended error without regard to mitigation by the crew.